

### REMARKS

Applicant has carefully studied the outstanding Office Action. The present amendment is intended to place the application in condition for allowance and is believed to overcome all of the objections and rejections made by the Examiner. Favorable reconsideration and allowance of the application are respectfully requested.

Applicant has amended claims 1, 23, 45 and 66 to more properly claim the present invention. No new matter has been added. Claims 1 - 86 are presented for examination.

In Paragraphs 2 - 24 of the Office Action, claims 1 - 86 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Guedalia, U.S. Patent No. 6,121,970 ("Guedalia") in view of Aldred et al., U.S. Patent No. 6,209,036 ("Aldred").

#### **Distinctions between Claimed Invention, U.S. Patent No. 6,121,970 to Guedalia and U.S. Patent No. 6,209,036 to Aldred et al.**

The present invention concerns copy protection of digital images residing on a server computer and available for viewing over the Internet. Proprietary image files referenced within web pages are protected by automatically referencing substitute files, such as files containing encrypted images or watermarked images, in their stead. Specifically, as disclosed in the present specification, a web page parser 116 (FIG. 1) parses a web page in order to identify proprietary images referenced therewithin, and a web page modifier 122 replaces references to proprietary image files in the web page with references to substitute data files instead. Similarly, at step 214 (FIG. 2) a server computer, such as server computer 100, generates a modified web page wherein references to proprietary image files are replaced with references to substitute data files. Image files are recognized as being protected by a consulting a protection status database 118, or by use of special tags such as <PROTECT> and </PROTECT> within web pages. (Original specification / page 18, lines 23 - 25; page 21, lines 8 - 10)

Guedalia describes interactive viewing of a large digital photo, too large to be displayed in its entirety at full resolution on a display monitor, by dynamically designating parameters, within a web page, for a size of a viewing window and a rectangular portion of the large photo to be viewed within the viewing window. An image server receiving a request including such parameters, prepares a standard image, such as a JPEG image, scaled appropriately so that the

desired rectangular portion of the large photo has pixel dimensions that match the dimensions of the desired viewing window. As a user interactively requests different portions of an image to view, the viewing window parameters and rectangular portion parameters within the web page are successively updated and, in turn, the image server sends different images. This gives the user an experience of navigating the large digital photo by panning around in different directions and zooming in and out at different levels of magnification.

Aldred teaches use of directory-reference hyperlinks for indirect accessing of web pages. Specifically, a directory-reference hyperlink points to a directory that store URLs for accessing particular web pages, rather to a specific web page. Such indirect accessing of web pages makes it easier for an administrator to manage a web site when web pages are added, deleted, updated or moved from one location to another. (Aldred / col. 3, lines 19 – 30; col. 4, lines 11 – 15)

In order to further distinguish between the present invention, Guedalia and Aldred, applicant has amended independent claims 1; 23, 45 and 66 so as to clarify that references to digital image files are substituted with references to corresponding encrypted files. Neither Guedalia nor Aldred describes such substitution. Indeed, Guedalia describes substituting a reference to a first image portion with a reference to a second image portion, and Aldred describes substituting a directory-reference URL with a web page URL.

The rejections of claims 1 - 86 in paragraphs 1 - 23 of the Office Action will now be dealt with specifically.

As to amended independent method claim 1, applicant respectfully submits that the limitation in claim 1 of:

*“generating a modified layout page from the original layout page by replacing at least one of the references to digital image files in the original layout page that are designated as being protected, with references to corresponding encrypted digital image files, prior to responding to the client computer request”*

is neither shown nor suggested in Guedalia and Aldred.

Because claims 2 - 22 depend from claim 1 and include additional features, applicant respectfully submits that claims 2 – 22 are not anticipated or rendered obvious by Guedalia, Aldred or a combination of Guedalia and Aldred.

Accordingly claims 1 - 22 are deemed to be allowable.

As to amended independent system claim 23, applicant respectfully submits that the limitation in claim 23 of:

*“a layout page generator generating a modified layout page from the original layout page by replacing at least one of the references to digital image files in the original layout page that are designated as being protected, with references to corresponding encrypted digital image files, prior to responding to the client computer request”*,  
is neither shown nor suggested in Guedalia and Aldred.

Because claims 24 - 44 depend from claim 23 and include additional features, applicant respectfully submits that claims 24 - 44 are not anticipated or rendered obvious by Guedalia, Aldred or a combination of Guedalia and Aldred.

Accordingly claims 23 - 44 are deemed to be allowable.

As to amended independent method claim 45, applicant respectfully submits that the limitation in claim 45 of:

*“generating a modified layout page from the original layout page by replacing at least one of the references to digital image files in the original layout page that are designated as being protected, with references to corresponding encrypted digital image files, prior to responding to the client computer request”*,  
is neither shown nor suggested in Guedalia and Aldred.

Because claims 46 - 65 depend from claim 45 and include additional features, applicant respectfully submits that claims 46 - 65 are not anticipated or rendered obvious by Guedalia, Aldred or a combination of Guedalia and Aldred.

Accordingly claims 45 - 65 are deemed to be allowable.

As to amended independent system claim 66, applicant respectfully submits that the limitation in claim 66 of:

*“a layout page generator generating the modified layout page from the original layout page by replacing at least one of the references to digital image files in the original layout page that are designated as being protected, with references to corresponding encrypted digital image files, prior to responding to the client computer request”*  
is neither shown nor suggested in Guedalia and Aldred.

Because claims 67 - 86 depend from claim 66 and include additional features, applicant respectfully submits that claims 67 - 86 are not anticipated or rendered obvious by Guedalia, Aldred or a combination of Guedalia and Aldred.

Accordingly claims 66 - 86 are deemed to be allowable.

**Support for Amended Claims in Original Specification**


Independent claims 1, 23, 45 and 66 have been amended to include the limitation of substituting a reference to a file with a reference to a corresponding encrypted file. Such substitution is described in the original specification at page 13, lines 11 – 22, and in the discussion of element 124 of FIG. 1 and step 214 of FIG. 2 at page 18, line 19 – page 19, line 6 and at page 21, lines 3 – 16, respectively.

For the foregoing reasons, applicant respectfully submits that the applicable objections and rejections have been overcome and that the claims are in condition for allowance.

Respectfully submitted,

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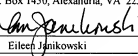
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By:

  
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